

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY BRADLEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-16-185-M
)	
SODEXO, INC.,)	(REMOVED FROM OKLAHOMA
)	COUNTY, CASE NO. CJ-2016-645)
Defendant.)	

NOTICE OF REMOVAL

Defendant Sodexo, Inc. (Sodexo), hereby removes this action from the District Court of Oklahoma County, Oklahoma, to the United States District Court for the Western District of Oklahoma pursuant to 28 U.S.C. § 1441, *et seq.*

1. On February 5, 2016, Plaintiff Nancy Bradley filed her Petition (hereinafter referred to as Complaint) in the District Court of Oklahoma County, Oklahoma, captioned *Nancy Bradley v. Sodexo Inc.*, Case No. CJ-2016-645. *See* Complaint (Ex. 1).
2. The Summons and Complaint were served on Sodexo on February 8, 2016. A copy of the Complaint, Summons, and Return of Service are attached hereto as Exhibit 1. No other pleadings, process, or orders have been served on Sodexo. Pursuant to LCvR 81.2(a), a copy of the docket sheet is attached as Exhibit 2.
3. This Notice of Removal is timely filed under 28 U.S.C. § 1446(b).
4. Plaintiff is employed at Soldier Creek Elementary School located in Midwest City, Oklahoma. *See* Complaint at ¶ 1 (Ex. 1). Upon information and belief, Plaintiff

resides in the State of Oklahoma, and intends to remain in Oklahoma. Thus, she is domiciled in the State of Oklahoma and is a citizen of the State of Oklahoma for purposes of diversity jurisdiction.

5. Sodexo is a corporation organized under the laws of the State of Delaware, with its principal place of business in the State of Maryland. Thus, it is a citizen of Delaware and Maryland for purposes of diversity jurisdiction.
6. Plaintiff seeks damages in excess of \$75,000, exclusive of interest and costs. *See* Complaint at Prayer for Relief (Ex. 1).
7. Therefore, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a), because there is complete diversity between the parties and the amount in controversy exceeds \$75,000, exclusive of interest and costs.
8. Pursuant to 28 U.S.C. § 1441(a), venue is proper in the United States District Court for the Western District of Oklahoma because this District includes Oklahoma County, Oklahoma, where this action was pending. *See* 28 U.S.C. § 116(c).
9. Pursuant to 28 U.S.C. § 1446(d), Sodexo certifies that it will promptly give written notice of the filing of this Notice of Removal to all known counsel of record, and will likewise file a copy of this Notice of Removal with the District Court of Oklahoma County, Oklahoma.
10. By filing this Notice of Removal, Sodexo does not waive any defense that may be available to it.

WHEREFORE, Defendant Sodexo, Inc., hereby removes this matter from the District Court of Oklahoma County, Oklahoma, to the United States District Court for the Western District of Oklahoma.

Dated: February 26, 2016

Respectfully submitted,

McAFEE & TAFT

/s/ Jessica L. Dickerson
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of February, 2016, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following registrants:

Rex Travis
P.O. Box 1336
Oklahoma City, Oklahoma 73101
Attorney for Plaintiff

/s/ Jessica L. Dickerson